

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 23-00085-01-CR-W-BCW
)	
BRANDON R. HAYWOOD,)	
)	
Defendant.)	

**MEMORANDUM OF MATTERS DISCUSSED AND
ACTION TAKEN AT PRETRIAL CONFERENCE**

PENDING CHARGE: On April 25, 2023, the Grand Jury returned a three-count Indictment charging Defendant Brandon R. Haywood with possession with intent to distribute cocaine (Count One), possession of a firearm in furtherance of a drug trafficking crime (Count Two), being a felon in possession of a firearm (Count Three).

The following matters were discussed and action taken during the pretrial conference:

TRIAL COUNSEL:

Government: Ashleigh Anna Ragner and Jessica L. Jennings

Case Agent: Detective Todd Winborn, Independence, Missouri Police Department

Defense: Dawn M. Parsons and possibly either Layne Moore or Jeannie Johnson

OUTSTANDING MOTIONS:

10/07/2024	view58	MOTION to suppress by Brandon R Haywood. Suggestions in opposition/response due by 10/21/2024 unless otherwise directed by the court. (Attachments: # 1 Exhibit A, # 2 Exhibit B)(Parsons, Dawn) (Entered: 10/07/2024)
12/06/2024	view70	Amended MOTION to suppress by Brandon R Haywood. Suggestions in opposition/response due by 12/20/2024 unless otherwise directed by the court. (Parsons, Dawn) (Entered: 12/06/2024)

TRIAL WITNESSES:

Government: 5 with stipulations; 7 without stipulations

Defendant: 1 witness, including the Defendant

TRIAL EXHIBITS:

Government: approximately 50 exhibits

Defendant: approximately 5 exhibits

DEFENSES: General denial

POSSIBLE DISPOSITION:

(X) Definitely for trial; () Possibly for trial; () Likely a plea will be worked out

TRIAL TIME: 2-3 days total

Government's case including jury selection: 2½ day(s)

Defendant: ½ day(s)

STIPULATIONS: The parties are discussing stipulations as to nexus for the firearm, drugs, and prior conviction.

UNUSUAL QUESTIONS OF LAW: None

FILING DEADLINES:

Witness and Exhibit Lists

Government: **Due on or before January 28, 2025.**

Defendant: **Due on or before January 28, 2025.**

Counsel are requested to list witnesses in alphabetical order on their witness list.

Exhibit Index, if required by the District Court, Voir Dire, Jury Instructions: Due on or before February 5, 2025.

Please Note: Jury instructions must comply with Local Rule 51.1

Motion in Limine: Due on or before February 5, 2025.

TRIAL SETTING: Criminal jury trial docket set for February 10, 2025.

Please note: The Government is requesting the first week of the docket as AUSA Ragner is out of town the second week of the docket. Defense is available the first week of the docket.

IT IS SO ORDERED.

/s/ Lajuana M. Counts

LAJUANA M. COUNTS

UNITED STATES MAGISTRATE JUDGE